

# Exhibit 1

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

**DECLARATION OF IAN GADEA-GUIDICELLI**

I, Ian Gadea-Guidicelli, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct based upon my personal knowledge and review of the relevant records:

1. I am the State Emergency Response Team Chief and Response Bureau Chief at the Florida Division of Emergency Management. If called as a witness, I could and would competently testify to the matters set forth herein.

2. On August 1, FDEM prepared a Geographic Information Systems (GIS) map to be submitted as supplemental authority in support of FDEM's venue arguments. Doc. 79-1. That map used the perimeter fence line surrounding the Dade-Collier Training and Transition Airport to define the area commandeered by FDEM to construct and operate an on-site detention facility. The map also indicated that only 2.2% of the commandeered area exists in Miami-Dade County.

3. Later that day, Plaintiffs responded to FDEM's notice with a different GIS map. Doc. 80-1. This map appears to define the commandeered area as including not only the airport, but all adjacent land owned by Miami-Dade County.

4. Contrary to Plaintiffs' response, FDEM has *not* commandeered all land owned by Miami-Dade County adjacent to the airport—indeed, most of that area is unusable wetland. Rather, as Director Guthrie's letter of intent to Miami-Dade reflects, *see* Doc. 12-5, FDEM has commandeered the "Dade-Collier Training and Transition Airport," which plainly refers to the airport strip and immediately surrounding area. Director Guthrie confirmed the scope of FDEM's operation when he listed the airport strip's address—"54575 Tamiami Trail E, Ochopee, Florida, 34141"—as the location for FDEM's activities. *Id.*

5. Given Plaintiffs' emphasis on areas surrounding the airport, I asked my team to identify any and all areas that state officials are using to operate the detention facility. After review, my team identified a few areas of fencing along the main road leading into the airport. That fencing has been erected to designate security checkpoints for the detention facility.

6. Upon learning this, I asked my team to prepare a new map that reflects the total area that has been commandeered related to the detention facility. That map is attached as Exhibit 2. The security checkpoints are designated with blue-and-white squares.

7. As the new map reflects, the security-checkpoint areas exist entirely in Collier County. As a result, if the security checkpoints are considered, the percentage of commandeered land existing in Miami-Dade County decreases from 2.2% to 2.02%.

Executed on August 2, 2025, in Tallahassee, Florida.

A handwritten signature in black ink, appearing to read 'Ian Gadea-Guidicelli', written over a horizontal line.

Ian Gadea-Guidicelli, SERT Chief